

February 28, 2014

Mr. Keith Wallace
Project Manager, IRWM
CA Department of Water Resources

Re: Comment Letter -- Proposition 84 IRWM Implementation Program, Round 3 Project Implementation Process Improvement

Dear Mr. Wallace,

We are writing on behalf of our two organizations -- IRS 501 (c) 3 conservation non-profit organizations operating in Fresno, Kings, Tulare and Kern counties -- to urge that the DWR IRWM Implementation Round 3 grant solicitation guidelines be revised to include scoring advantage for inclusion of ecosystem restoration benefits in water project applications, similar to the scoring advantage currently in place for disadvantaged communities. Doing so will enable our two organizations to work successfully with the six active Tulare Basin IRWM groups to include ecosystem restoration components in their Round 3 water project applications. Indeed, this improvement will have state-wide benefits, as it will assist IRWMs and Watershed Coordinators throughout California in aligning effectively with the State's priorities under the CA Water Action Plan. It will effect a much-needed agency "alignment" between DWR and DOC and enhance cost-effective use of State funds as applied under drought, flood, or "normal" conditions toward the achievement of regional water supply self-sufficiency and the watershed/ecosystem health that is the absolute prerequisite for regional water supply self-sufficiency.

The Tulare Basin Wildlife Partners (TBWP) has participated in Rounds 1 and 2 of the IRWM process working with the Kings Basin Water Authority, Kaweah Basin IRWM, Deer Creek/Tule River IRWM, Poso Creek IRWM, and Kern Co. IRWM, while assisting with the development of the Southern Sierra IRWM/RWMG (SS RWMG). This effort has been led by Kathy Wood McLaughlin, the Tulare Basin Watershed Coordinator (Tulare Basin Watershed Initiative/TBWI) funded by the CA Department of Conservation Watershed Program under Proposition 84. The TBWP goal under DOC funding has been to include project concepts in Tulare Basin IRWM applications derived from the four-part Tulare Basin Conservation Plan (Conceptual Area Protection Plans adopted in 2006-2010 by CA Department of Fish and Wildlife/Wildlife Conservation Board) and the 2010 Conservation Plan Water Supply Strategies Report. This has met with limited success, due to the absence of scoring advantage for ecosystem restoration benefits under the IRWM Round 1 and 2 processes.

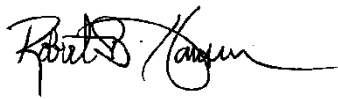
The Sequoia Riverlands Trust (SRT) has been instrumental in developing the SS RWMG, which is now completing DWR-funded Plan requirements. The SS RWMG, like the other Tulare Basin IRWM groups, is already in the early stages of preparing project applications for submission under Round 3. In its project applications, the SS RWMG and SRT will utilize the best available scientific information resulting from the Southern Sierra Partnership climate change adaptation mapping and project area prioritization process.

In response to current drought and future flood conditions--and indeed during "normal" conditions as well--the emphases of our two organizations is on the application of best science and management practices in project design for riparian corridor restoration, groundwater replenishment, and storm water management, thereby contributing to regional self-sufficiency in water quality and quantity. We have developed a strong and effective network of federal, state, NGO, and water agency partnerships. We work together closely to further our mutual goals for watershed and ecosystem health in the Tulare Basin.

In order to enable the full participation -- on a statewide basis -- of science-based conservation NGOs such as ourselves in the IRWM Round 3 process and enable our efforts to further CA State Water Action Plan priorities, we urge the revision of the DWR IRWM Implementation guidelines to include scoring advantage for inclusion of ecosystem restoration benefits in water project applications under Round 3.

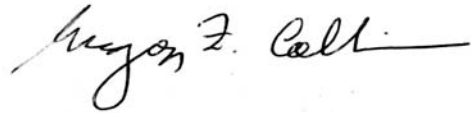
Thank you for your consideration of this request.

Sincerely,



Robert B. Hansen
President
Tulare Basin Wildlife Partners

Sincerely,



Greg Collins
President
Sequoia Riverlands Trust

cc: DWR--Tracie Billington, Kamyar Guivetchi, Michelle Dooley
DOD -- John Lowrie, David Thesell
SRT -- Soapy Mulholland, Hilary Dustin, Chris Moi
SS RWMG -- Bobby Kamansky
TBWP/TBWI -- Kathy Wood McLaughlin, Richard Moss, Carole Combs
DFW -- Jeff Single, John Shelton
CSG -- Tasha Newman